



May 20, 2015

Mr. Ben Neill
Water Resources Control Engineer
Source Control Unit
San Diego Regional Water Board

Emailed to: sandiegowaterboards.ca.gov

RE: 656901:bneill - Comment – Tentative Order Nos. R9-2015-0013

Dear Mr. Neill,

OC Public Works appreciates the opportunity to provide comments on Tentative Order No. R9-2015-0013 (Tentative Order), NPDES No. CAG919003, General Waste Discharge Requirements for Groundwater Extraction Discharges to Surface Waters within the San Diego Region. The following comments are submitted for your review and consideration:

- 1) The Tentative Order would establish an instantaneous maximum value of 20 NTU (nephelometric turbidity unit) as an effluent limitation for discharges to freshwater inland surface waters, which is based on the Basin Plan objectives in the San Juan Hydrologic Unit. In addition to the instantaneous maximum of 20 NTU, the discharge shall not exceed the ambient turbidity of the surface water at any time. Turbidity can be highly variable and affected by conditions unrelated to temporary groundwater extraction. It is recommended that turbidity be used as a trigger for follow-up action, such as evaluation of best management practices, but that exceedances of the effluent limitation for turbidity not constitute an immediate violation of the Order.
- 2) A total suspended solids (TSS) effluent limitation of 75 mg/L applies to groundwater discharges to surface waters outside of the Newport Bay Watershed in the Santa Ana Region (Order No. R8-2009-0003) while the Los Angeles Region sets maximum daily and average monthly limits of 75 and 50 mg/L, respectively (Order No. R4-2014-0095). Order No. R9-2008-0002 established and the Tentative Order would continue, an instantaneous maximum effluent limitation of 50 mg/L and an average monthly effluent limitation of 30 mg/L for TSS in the San Diego Region. For a public works organization that carries out regional transportation and flood control improvement projects that potentially have a need to temporarily discharge extracted groundwater to surface waters during construction, in all three aforementioned Regional Board jurisdictions, it is helpful to understand the basis for the lower TSS effluent limitations.

- 3) Water and sediment quality monitoring data collected in South Orange County between 2003 and 2013 has been assessed by the Orange County Stormwater Program and analysis indicates that metals are not a source of toxicity in wet or dry weather (*2014 San Diego Region State of the Environment Report*, page 34). At the same time, special studies have identified naturally occurring elevated concentrations of metals (cadmium, nickel, zinc) in groundwater of South Orange County dominated by marine sedimentary geologic formations. Total recoverable manganese and total recoverable iron have also been identified in areas of South Orange County at naturally occurring concentrations which exceed the instantaneous maximum effluent limitations of 0.05 mg/L and 0.3 mg/L, respectively. It is recommended that site specific effluent limitations for metals be allowed in areas where local geology has been determined to be a source of elevated metals concentrations in groundwater.

We appreciate your consideration of these comments. Please contact James Fortuna (714/955-0680) or Jon Curry (714/955-0685) with any questions.

Respectfully Yours,



Grant Sharp, Manager
Environmental Monitoring Division